

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

NELSON WILLIS,

Plaintiff,

vs.

ADAM M. ARON,

Defendant.

Case No.: 4:23-CV-732-ALM-KPJ

**DEFENDANT ADAM M. ARON'S RESPONSE TO PLAINTIFF'S
EMERGENCY MOTION TO COMPEL IMMEDIATE PRODUCTION OF EMAILS,
TEXT MESSAGES, AND OTHER COMMUNICATIONS PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 37(a)**

Defendant Adam M. Aron ("Aron") requests that the Court exercise its sound discretion and deny Plaintiff's Emergency Motion to Compel Immediate Production of Emails, Text Messages, and Other Communications pursuant to Federal Rule of Civil Procedure 37(a) (the "Motion"), filed on July 1, 2024 [Dkt. 57]. Plaintiff's Motion is premature. He has not attempted to obtain the requested materials via the appropriate discovery methods in this case. For this reason, Plaintiff's Motion should be denied.

Respectfully submitted,

By: /s/ Richard A. Illmer

Richard A. Illmer
State Bar No. 10388350
rick.illmer@huschblackwell.com
Meghann Reeves
State Bar No. 24094499
meghann.reeves@huschblackwell.com

HUSCH BLACKWELL LLP
1900 N. Pearl St., Suite 1800
Dallas, Texas 75201
(214) 999-6100
(214) 999-6170 *facsimile*

ATTORNEYS FOR DEFENDANT
ADAM M. ARON

CERTIFICATE OF SERVICE

The undersigned certifies that on July 15, 2024, a true and correct copy of the foregoing document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Richard A. Illmer

Richard A. Illmer